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VIA ECF

April 12, 2024

Hon. Christina Reiss
United States District Court for the
District of Vermont
P.O. Box 446
Burlington, VT 05402-0446


Re: *Black Love Resists in the Rust et al. v. City of Buffalo et al.*
W.D.N.Y. Civ. A. No. 1:18-cv-00719-CCR

Dear Judge Reiss:

I write on behalf of the Plaintiffs in this matter to request an extension of the page limit for Plaintiffs' memorandum of law in support of their motion for class certification, pursuant to W.D.N.Y. Local Rule 7(a)(2)(C). Plaintiffs intend to file their motion for class certification on or before the deadline for such motions, which is currently April 19, 2024. Plaintiffs request the Court's permission to file a memorandum of law that is up to 50 pages in length. Due to the complexity of this case, adequate treatment of the issues raised by the motion requires this exception to the usual 25-page limit in Local Rule 7(a)(2)(C). Plaintiffs challenge Defendants' policies and practices going back as far as 2015 and assert claims under the Fourth and Fourteenth Amendments, as well as the 1964 Civil Rights Act. Plaintiffs seek certification of three separate classes and seek to certify both damages and injunctive-relief classes. The additional pages are accordingly necessary due to the large number of parties, lengthy time period, and multiple issues raised by the motion.

I have consulted with counsel to the Defendants and they consent to this request.

Sincerely,


Matthew Parham, Esq.
Director of Litigation and Advocacy

CC: All counsel of record (via ECF)